

routing.

In the Office Action, the Examiner, on p. 3, 2nd paragraph, states that Akhavan teaches the rerouting element of the present invention at 21/46-22/2. Applicants respectfully disagree. Akhavan uses the home location register 305 for the rerouting, not the base station (which would have to be the base station 308 in Akhavan).

In more detail, Akhavan, at 21/46-22/2, discloses a standard cellular telephone system coupled to a standard public switched telephone network (PSTN) 301 supporting the personal phone number (PPN) service. The base station 308 in the "home" zone 309 is connected via landline to the public switched telephone network

301. If the cordless base station 308 has a cellular capability, there is a radio link between the nearest base station 304 supported by the mobile switching center 303 of the cellular telephone system. When a subscriber portable station or hand set 310 comes within the "home" zone 309, base station 308 causes a request for cellular call forwarding to be transmitted to the cellular telephone system through base station 304 to mobile switching center 303. The location and PPN of subscriber station 310 is stored in a home location register 305, coupled to the mobile switching center via data lines 311. The home location register 305 keeps track of the location of "home" zone 309. When a subscriber station 310 roams out of the "home" zone, a radio link is established with the nearest cellular base station 304. This location is transmitted through the mobile register 305 so that incoming calls for the subscriber 310 can be routed to the correct base station to establish cellular communication. Thus, the rerouting of Akhavan does not take place according to the invention by rerouting the call using the base station.

Akhavan discloses that the routing of an incoming (to the subscriber station) telephone call is always and only organized by the mobile switching center 303 (or 313

in the figure), which as part of the standard public switched telephone network 301, whereby the location and PPN of subscriber station 310 is stored in a home location register 305, which is coupled to the mobile switching center 303 via data lines 311. More precisely, the routing and especially the rerouting of an incoming telephone call, where the subscriber station is out of the home area, is independent from the cordless base station in the home zone. This is well established by the following sentence of Akhaven (21/63-22/2):

When a subscriber station 310 roams out of the "home" zone, a radio link is established with the nearest cellular base station 304. This location is transmitted through the mobile register 305 so that incoming calls for the subscriber 310 can be routed to the correct base station to establish cellular communication.

The home base station is not actively involved in the routing. This is in contrast to the present invention in which incoming telephone calls are always routed in a first step to the base stations of a home area. Only in the case of non-availability of the called wireless communication terminal equipment in the home area, the home base station initiates a rerouting of the call to the sub-communication network. This procedure is absolutely in contrast to the scenario described by Akhaven.

2. Wiedeman does not disclose that the sub-communication network may be the source of a call setup for rerouting the call.

Wiedeman discloses a situation where a remote location called the "caller" 50 desires to make a telephone call to a cellular telephone user 30 that is roaming and is not located in a terrestrial cellular telephone service area (TCTSA). The caller 50 uses the PSTN 21 to call the user's HG12 or perhaps some other equivalent location. The call is transferred by the PSTN switch to the user's HG12. The HG12 equipment 23

processes the call and, by accessing the home user data base 31. finds that the user
30 is roaming in the satellite service area 24 and thereby knows to route the call to the
AG.

Thus, Wiedeman does not disclose that the sub-communication network may be
the source of a call setup for rerouting the call, which is an elementary part of the
present invention.

*3. There is no motivation to combine Akhaven and Wiedeman since neither
teaches the inventive rerouting according to the present invention, and since one does
not provide a solution to problems raised in the other to result in the present invention.*

Akhaven controls the routing of a call by the mobile switching center without
addressing the base station of the home area, while the present invention specifically
addresses the base station of the home area first. From a technical point of view, it is
also clear that the mobile switching center can never be a part of the base station of the
home area, since it has to be a part of and associated with the whole communication
network. Incoming telephone calls have to be switched even when the base station of
the home area is switched off. Wiedeman does not solve this issue in that it does not
disclose that the sub-communication network may be the source of a call setup for
rerouting the call. The functional use of the base station with respect to the call routing
are at odds with one another, and thus could not be combined together. Thus,
Applicants respectfully contend that one of ordinary skill in the art would not combine
Akhaven with Wiedeman for the present inventive solution.

**35 U.S.C. §103(a), Claims 7-9, 12, and 18 Obviousness over Wiedeman '623 in
view of Akhavan '308 and APA**

4. Applicants rely on the above arguments to overcome the §103 rejections for the

remaining claims.

For these reasons, Applicants assert that the claim language clearly distinguishes over the prior art, and respectfully request that the Examiner withdraw the §103(a) rejection from the present application.

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Conclusion

Inasmuch as each of the rejections have been overcome by the arguments presented, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

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Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D C 20231 on December 3, 2001.

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